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DIRECTV, LLC

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DAVID VARAS,

Plaintiff,

v.

DIRECTV, LLC,

Defendant.

Case No. 5:16-cv-01395 SVW-AS

[Hon. Stephen V. Wilson]

**DEFENDANT DIRECTV, LLC'S  
NOTICE OF RELATED  
OPPOSITION/CROSS-MOTION FOR  
SUMMARY JUDGMENT  
REGARDING DIRECTV'S LACK OF  
EMPLOYMENT RELATIONSHIP  
WITH PLAINTIFFS**

Date: September 11, 2017

Time: 1:30 p.m.

Dept.: 10A

Judge: Stephen V. Wilson

[[Proposed] Judgment filed concurrently]

Date Action Filed: February 29, 2016

Pretrial Conference: November 20, 2017

Trial Date: November 21, 2017

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR  
RESPECTIVE COUNSEL:**

PLEASE TAKE NOTICE that on August 9, 2017, Defendant in the related case of *Canh Le v. Directv, LLC*, Case No. 16-cv-1369, filed its Opposition/Cross-Motion for Summary Judgment Regarding DirecTV's Lack of Employment Relationship with Plaintiffs. In the interests of judicial economy and pursuant to the Court's In Chambers Order Setting Schedule (*Le* Dkt. No. 74), one opposition/cross-motion for summary judgment was filed in the *Le* case, and that one motion is applicable to each of the other related cases still pending before the Honorable Stephen V. Wilson in this district, including this one. Those related cases are:

*Paul Guzik v. DirecTV, LLC*; Case No. 2:16-cv-01967

*Armando Solis Juarez v. DirecTV, LLC*, Case No. 5:16-cv-00400

*Jeffrey Kidd v. DirecTV, LLC*, Case No. 2:16-cv-01506

*Jeremy Lasater v. v. DirecTV, LLC*, Case No. 2:16-cv-01373

*Mendamar Lkhagvadojr v. DirecTV, LLC*, Case No 2:16-cv-01502

*Henry Trujeque v. DirecTV, LLC*, Case No. 2:16-cv-01477

*Jamie Nault v. DirecTV, LLC*, Case No. 2:16-cv-05721

Defendant's Cross Motion For Summary Judgment/Summary Adjudication Regarding DirecTV's Lack of Employment Relationship is based on the records in *Guzik, Juarez, Kidd, Lasater, Lkhagvadorj, Trujeque, Varas, Nault*, and *Le*, including the following documents filed in the *Le* matter: the Notice of Cross-Motion and Cross-Motion for Summary Judgment Regarding DirecTV's Lack of Employment Relationship; the Compendium of Evidence and Separate Statement of Uncontroverted Facts and Conclusions of Law in support thereof; the Response to Plaintiff's Statement of Uncontroverted Facts and Conclusions of Law and Objections to Evidence Submitted by Plaintiffs in Support of Motion for Partial Summary Judgment; and such further evidence, arguments and briefing as may be allowed or presented at or before the

1 hearing on this motion.

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3 Dated: August 9, 2017

AKIN GUMP STRAUSS HAUER &  
FELD LLP

4 BY /s/ Gregory W. Knopp  
5 Gregory W. Knopp  
6 Attorneys for Defendant DIRECTV LLC  
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